

**To:** Damico, Genevieve[damico.genevieve@epa.gov]  
**From:** Harris, Doug  
**Sent:** Tue 8/18/2015 9:19:40 PM  
**Subject:** Re: Status of EPA's August 11, 2015 Proposal

Genevieve,

We appreciate both George and Robert's willingness to meet with us on August 11, 2015 as well as the prior meeting on April 9, 2015. As always we enjoy meeting with you missed seeing you at these meetings. Our team believes this meeting was productive. Hopefully your absence does not create any confusion as we move forward but the basis for this meeting was the most recent USEPA Region 5 draft permit dated October 2014. We are busy preparing our response to the four items proposed by EPA during our August 11th meeting.

1. Enhanced feed stream analysis requirements as proposed in the October 2014 draft permit, with revisions discussed between EPA and Veolia in February 2015:
2. Installation and permanent operation of activated carbon injection systems on Units 2 and 3, with specific control efficiency:
3. Installation and operation of high efficiency particulate filters(HEPA) filter on Units 2, 3, and 4:
4. Installation and operation for five years of mercury continuous emissions monitoring systems(CEMS) on Units 2, 3 and 4, with publicly viewable web site.

We are diligently working on our response and see no reason that the September 15, 2015 deadline cannot be met. We are already in contact with a well respected engineering contractor to better understand HEPA filtration. We greatly appreciate your offer to meet on a technical level but do not believe we are prepared at this time. In an effort to assure that our response meets the EPA's deadline it may be necessary conduct the technical meetings after we submit our response and have conceptual agreement.

On 18 August 2015 at 11:50, Damico, Genevieve <[damico.genevieve@epa.gov](mailto:damico.genevieve@epa.gov)> wrote:

Doug,

Thank you for meeting with George Czerniak and Robert Kaplan on August 11, 2015 to discuss EPA's proposal for addressing your concerns regarding the draft Title V renewal permit for Veolia's facility in Sauget, Illinois. As you discussed at the meeting, EPA is offering to include the following elements in a revised Title V renewal permit for Veolia:

1. Metal feedrate operating parameter limits as proposed in the January 2013

draft permit;

2. Enhanced feedstream analysis requirements as proposed in the January 2013 draft permit, with revisions discussed between EPA and Veolia in February 2015;
3. Installation and permanent operation of activated carbon injection systems on Units 2 and 3, with specified control efficiency;
4. Installation and operation for five years of mercury continuous emissions monitoring systems (CEMS) on Units 2, 3 and 4;
5. Installation and operation of high efficiency particulate air (HEPA) filters on Units 2, 3 and 4;
6. Veolia must post CEMS data to a publicly viewable website.

Additionally, Veolia must agree that it will not appeal the final permit.

As discussed at the meeting, EPA must receive Veolia's response to the above proposal **no later than September 15, 2015**. In the meantime, to facilitate Veolia's consideration of the proposal, EPA is available over the next two weeks to discuss technical details under each proposed element above. Please let me know your availability for the next two weeks so that we can schedule these meetings.

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